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VIA CM/ECF

September 2, 2022

Hon. Julie R. Rubin
United States District Judge
U.S. District Court, District of Maryland
101 W. Lombard St., 3C
Baltimore, MD 21301

**Re: Consent Motion to Amend Complaint
Bolden v. CAEI, Inc. et al
1:21-cv-02295-JRR**

Judge Rubin,

Pursuant to the Court's Letter Order Regarding Motions (ECF 25), please note that the Plaintiff intends to file a Consent Motion to Amend Original Complaint ("Motion")¹. The primary purpose of the Motion is to substitute Baltimore Gas and Electric Company ("BGE") for Exelon Business Services Company, LLC ("Exelon") as a defendant in this matter².

Undersigned counsel for Plaintiff and counsel for both Exelon and BGE (BGE is also represented by current counsel for Exelon) have conferred and agreed to the following:

1. Exelon and BGE are both fully owned subsidiaries of Exelon Corporation, and BGE is the appropriate defendant in this matter.
2. The answer previously filed by Exelon/BGE (ECF 23) should be considered BGE's answer to the proposed First Amended Complaint, and this substitution does not necessitate any changes to the Court's Scheduling Order (ECF 24).
3. The Corporate Disclosure Statement previously filed by Exelon also accurately describes the corporate structure of BGE.

¹ The other defendant in this matter, CAEI, Inc., has not answered or otherwise appeared despite being served on December 14, 2021.

² The proposed First Amended Complaint changes references to Exelon to instead refer to BGE; otherwise no other factual allegations will be changed. It also updates Plaintiff's address in the caption.

Sincerely,

/s/ Joseph D. Allen

Joseph D. Allen, Esq.
Attorney for Plaintiff, Harry A. Bolden

CERTIFICATE OF SERVICE

I hereby certify that, on this 2nd day of September, 2022, I caused the foregoing to be served via CM/ECF and email on counsel of record.

/s/ Joseph D. Allen